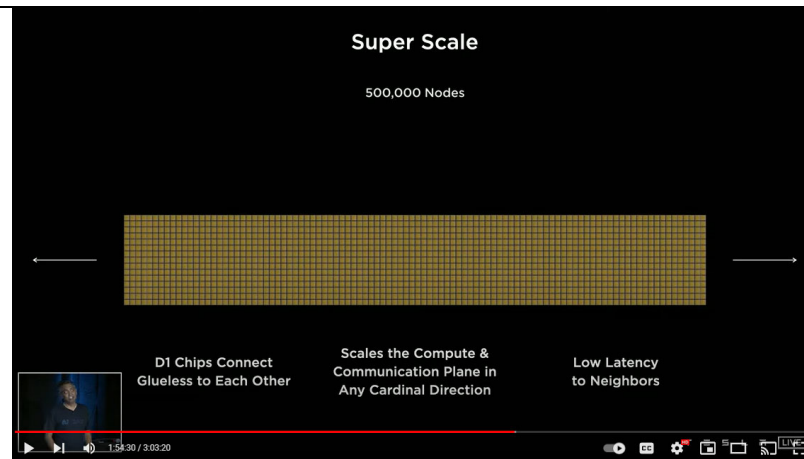


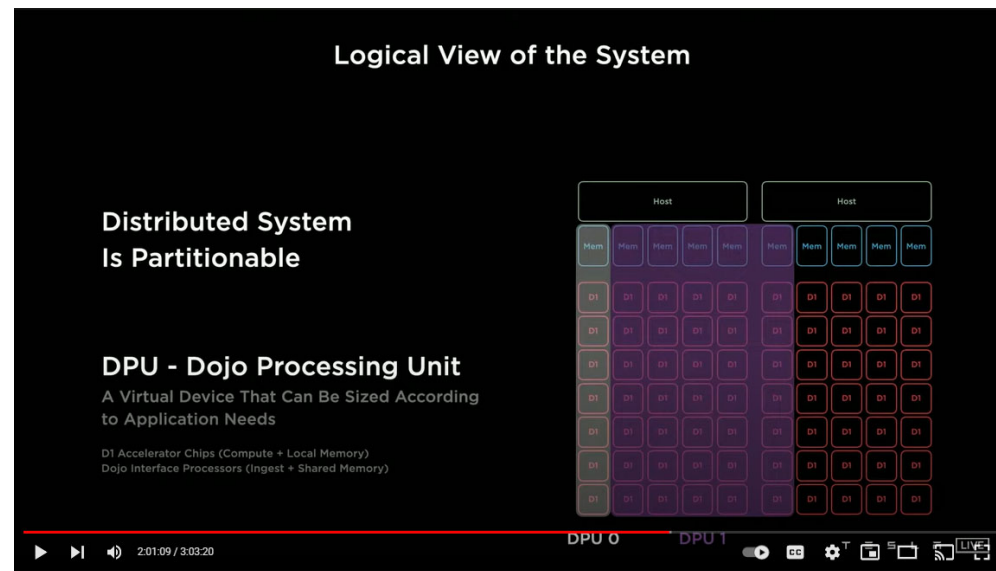
EXHIBIT N

U.S. Patent No. 11,113,585	
Claim 1	Exemplary Infringement Evidence ¹
[1pre] A system comprising:	<p>The Dojo supercomputer infringes the '585 patent alone or together with Tesla vehicles operating Software Version 9.0 and beyond (this includes vehicles with enhanced autopilot and/or full self-driving (FSD)). The Dojo supercomputer alone or together with each of these vehicles meets the limitations of the claimed system.</p> <p>The discussion and evidence cited in claims [1a-e] are incorporated herein.</p>
[1a] one or more processors; and	<p>Tesla's autonomous vehicle simulation system includes one or more processors.</p> <p>For example, the Dojo supercomputer includes one or more processors including one or more Dojo D1 chip(s).</p> <div data-bbox="877 738 1659 1185" data-label="Figure"> </div> <p>See Tesla AI Day video, available at https://www.youtube.com/watch?v=j0z4FweCy4M&t=3s</p>

¹ These infringement contentions are prepared with publicly available information.



Id.



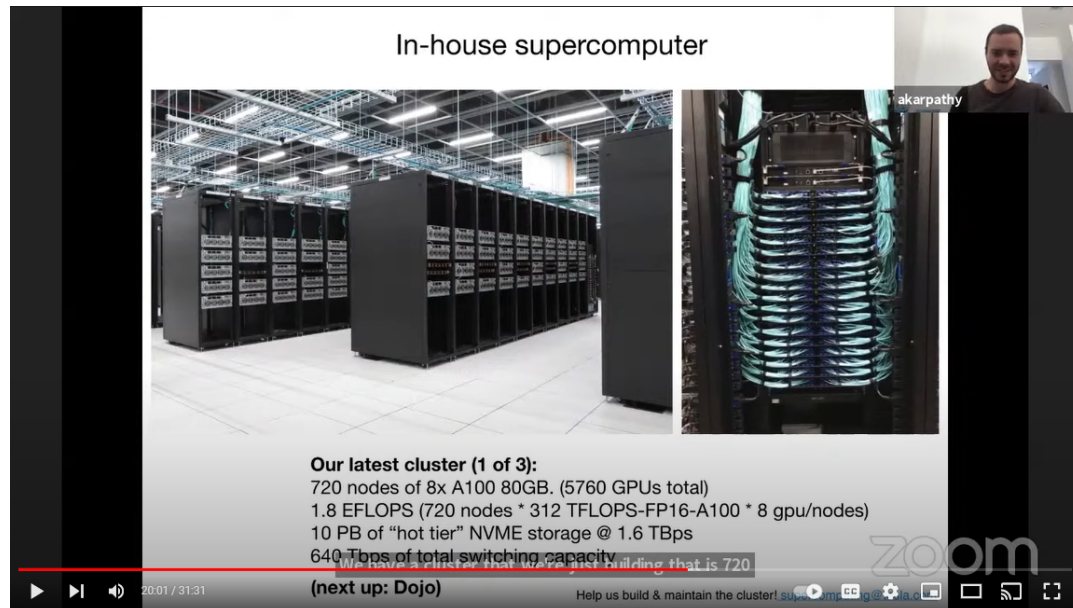
Id.

[1b] one or more memories that store at least a first one or more digital pictures correlated with a

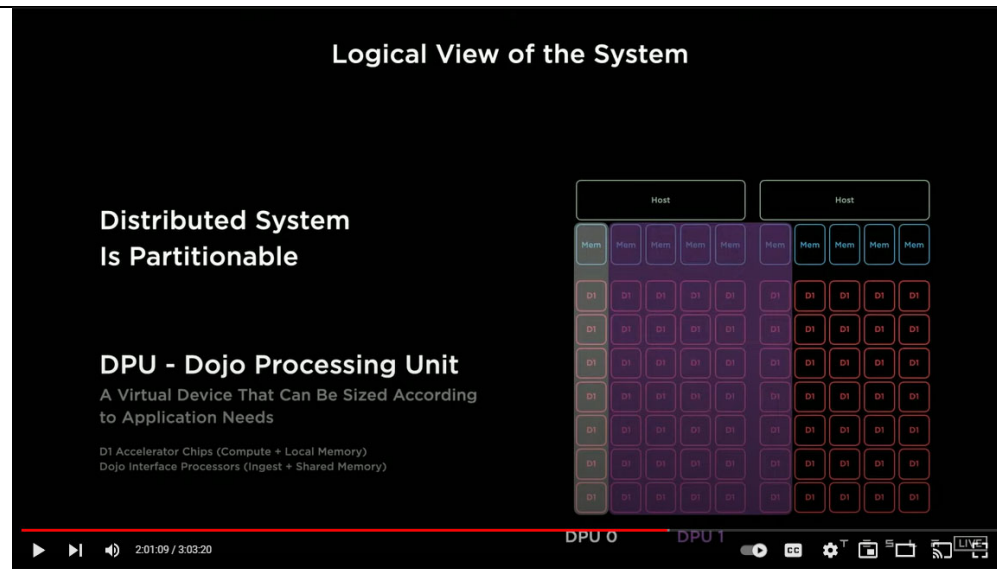
Tesla's autonomous vehicle simulation system includes memory for storing digital pictures correlated with one or more instructions sets for operating a first object of a first application program. The discussion and evidence cited in claims [1c] is incorporated herein.

first one or more instruction sets for operating a first object of a first application program, wherein the one or more processors are configured to perform at least:

For example, Tesla's autonomous vehicle simulation system includes volatile and non-volatile storage, such as NVME or DRAM respectively, for storing executable code correlated with pictures.



See, e.g., [CVPR'21 WAD] Keynote - Andrej Karpathy, Tesla, available at <https://www.youtube.com/watch?v=g6bOwQdCJrc>.

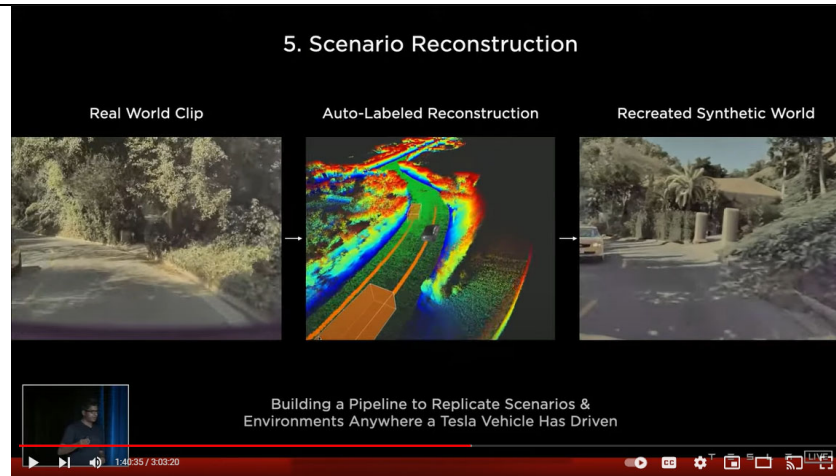


See Tesla AI Day video, available at <https://www.youtube.com/watch?v=j0z4FweCy4M&t=3s>

"We do have a major program at Tesla which we don't have enough time to talk about today called "Dojo". That's a super powerful training computer. The goal of Dojo will be to be able to take in vast amounts of data and train at a video level and do unsupervised massive training of vast amounts of video with the Dojo program – or Dojo computer."

[Elon Musk hints at Tesla's not-so-secret Dojo AI-training supercomputer capacity - Electrek](#)

	<p>Karpathy commented on the effort:</p> <p><i>"We have a neural net architecture network and we have a data set, a 1.5 petabytes data set that requires a huge amount of computing. So I wanted to give a plug to this insane supercomputer that we are building and using now. For us, computer vision is the bread and butter of what we do and what enables Autopilot. And for that to work really well, we need to master the data from the fleet, and train massive neural nets and experiment a lot. So we invested a lot into the compute. In this case, we have a cluster that we built with 720 nodes of 8x A100 of the 80GB version. So this is a massive supercomputer. I actually think that in terms of flops, it's roughly the number 5 supercomputer in the world."</i></p> <p>https://www.inputmag.com/tech/tesla-showed-off-its-massive-supercomputer-for-self-driving-data-processing</p>
<p>[1c] receiving or generating a new one or more digital pictures that depict at least a portion of a surrounding of: the first object of the first application program, a second object of the first application program, or a first object of a second application program;</p>	<p>Tesla's autonomous vehicle simulation system includes the ability to receive or generate a new one or more digital pictures that depict at least a portion of a surrounding of: the first object of the first application program, a second object of the first application program, or a first object of a second application program.</p> <p>For example, Tesla uses a supercomputer called DOJO to simulate (the claimed "generating a new one or more digital picture that depict at least a portion of the surrounding") real world driving environments for simulated Tesla Fleet vehicles (the claimed first object) using real world data and generated data.</p>



See Tesla AI Day video, available at <https://www.youtube.com/watch?v=j0z4FweCy4M&t=3s>



Id.

This real world and generated data includes video data, which includes digital pictures. Given that the video data is from the real world and generated simulations of real world environments the digital pictures depict at least a portion of a surrounding of: the first object (e.g., the car

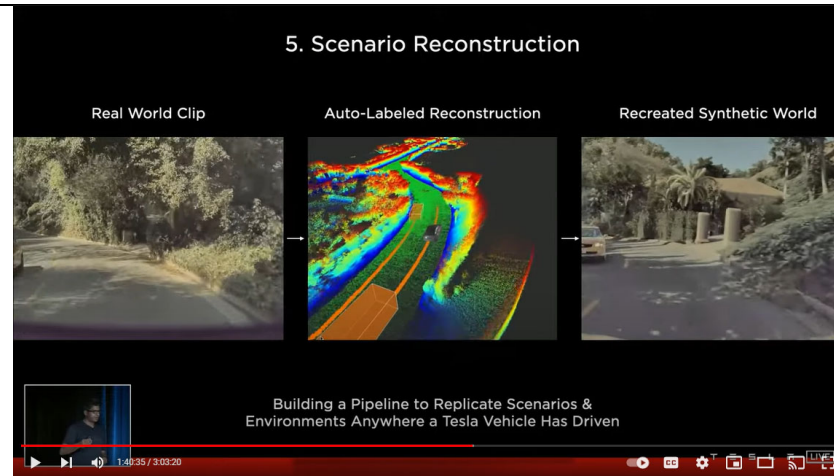
avatar) of the first application program. See, for example, the simulated environment below showing a simulation of an person near the simulated car from the first application program (DOJO AI simulation).



See Tesla AI Day video, available at <https://www.youtube.com/watch?v=j0z4FweCy4M&t=3s>

As shown in the above-cited video, Tesla's supercomputer is capable of behaving appropriately because the simulated car is provided with driving instructions that are correlated with objects, e.g., simulated people, cars, traffic lights, traffic signs, etc.

	<div data-bbox="854 191 1696 662" data-label="Image"> </div> <p>See Tesla AI Day video, available at https://www.youtube.com/watch?v=j0z4FweCy4M&t=3s</p>
<p>[1d] determining the first one or more instruction sets for operating the first object of the first application program based on at least partial match between the new one or more digital pictures and the first one or more digital pictures; and</p>	<p>Tesla's autonomous vehicle simulation system includes the ability to determine the first one or more instruction sets for operating the first object of the first application program based on at least partial match between the new one or more digital pictures and the first one or more digital pictures.</p> <p>As previously discussed, Tesla uses a supercomputer called DOJO to simulate real world driving environments for simulated Tesla Fleet vehicles using real world data and generated data.</p>



See Tesla AI Day video, available at <https://www.youtube.com/watch?v=j0z4FweCy4M&t=3s>

For example, the DOJO simulation determines an instruction set (e.g., steer to the left) for operating the first simulated vehicle (first object) of the simulation application based on at least partial match between a new picture (e.g., the person jogging) and training data that similar shows a person jogging on the right-hand side of the car (e.g., the claimed “first one or more digital pictures”).



See Tesla AI Day video, available at <https://www.youtube.com/watch?v=j0z4FweCy4M&t=3s>

[1e] at least in response to the determining, executing the first one or more instruction sets for operating the first object of the first application program, wherein the first object of the first application program, the second object of the first application program, or the first object of the second application program autonomously performs one or more operations defined by the first one or more instruction sets for operating the first object of the first application program.

Tesla's autonomous vehicle simulation system includes the ability to least in response to the determining, executing the first one or more instruction sets for operating the first object of the first application program, wherein the first object of the first application program, the second object of the first application program, or the first object of the second application program autonomously performs one or more operations defined by the first one or more instruction sets for operating the first object of the first application program. The discussion and evidence cited in claims [1c-d] are incorporated herein.

For example, the DOJO simulation, in response to determining the person of the right hand side of the simulated car, causes the first object (simulated car) of the application to autonomously perform one or more operations defined by the first one or more instruction sets for operating the first object of the application (i.e., steers the car to the left) at least by executing the first one or more instruction sets for operating the first object of the application.